



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS:ICR
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 8, 2018

By Email and ECF

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Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

The government is producing the following materials that have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37):

- On November 7, the government produced English translations of certain Chinese-language source materials which were previously produced to the defendant on October 16, 2018, under Bates Number DZ067471. This translation production, which is Bates stamped TR002258-TR002891, corrected and replaced the translations previously produced under cover of letter dated October 16, 2018, under Bates range TR002258-TR002586.

To assist counsel in identifying the Chinese-language source document for each translation, the government provided to defense counsel under separate cover a chart identifying the Chinese-language source document for each translation Bates stamped TR002258-TR002891;

- Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government is producing electronically stored information obtained from searches of email accounts used by the defendant's coconspirators (DZ067472-DZ067473; ESI00044518-ESI00044980);
- The government is also producing English translations of certain Chinese-language source materials included in the documents produced to the defendant under Bates number DZ067472 and Bates range ESI00044518-ESI00044980. The translations of the documents produced under Bates number DZ067472 have been Bates stamped TR002892-TR002927. The

translations of the documents produced under Bates range ESI00044518-ESI00044980 have been Bates stamped TR002928-TR003102.

To assist counsel in identifying the Chinese-language source document for each translation, the government has provided to defense counsel under separate cover charts identifying the Chinese-language source document for each translation Bates stamped TR002892-TR002927 and TR002928-TR003102. The government expects to produce a small number of additional translations of certain Chinese-language source materials contained in this production to the defendant by November 16, 2018.

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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Enclosures (TR002258-TR003102)
(DZ067472-DZ067473)
(ESI00044518-ESI00044980)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)